Case	16-33299-ABA Doc 66 Filed 07/17/19 Entered 07/17/19 16:04:43 Desc Page 1 of 5			
1	Michelle R. Ghidotti-Gonsalves, Esq. (232837)			
2	Ghidotti Berger, LLP 1920 Old Tustin Ave.			
3	Santa Ana, CA 92705 Tel: (949) 427-2010 Fax: (949) 427-2732			
4	mghidotti@ghidottiberger.com			
5	Authorized Agent for Creditor			
6	US Bank Trust National Association as Trustee of the Chalet Series IV Trust C/O SN Servicing Corp			
7	UNITED STATES BANKRUPTCY COURT			
8	DISTRICT OF NEW JERSEY (CAMDEN)			
9	In Re: RAYMOND W LEONG Case No.: 16-33299-ABA CHAPTER 12			
10	Debtor(s).			
11	REQUEST FOR SPECIAL NOTICE			
12				
13				
14				
15				
16				
17	TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTORS, AND ALL			
18	INTERESTED PARTIES			
19	PLEASE TAKE NOTICE that GHIDOTTI BERGER, LLP, attorneys for US Bank			
20	Trust National Association as Trustee of the Chalet Series IV Trust C/O BSI Financial Services			
21	hereby requests special notice of all events relevant to the above referenced bankruptcy and			
22	copies of all pleadings or documents filed in relation to the above referenced bankruptcy,			
23	including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the			
24	commencement of any adversary proceedings, the filing of any requests for hearing, objections,			
25	and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which			
26	must be noticed to creditors, creditors' committees and parties-in-interest and other notices as			
27	required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-			
28	referenced bankruptcy court.			
	1			
	REQUEST FOR SPECIAL NOTICE AND SERVICE OF PAPERS AND RESERVATIONS OF RIGHTS			

Case	16-33299-ABA Doc 66 Filed 07/17/19 Entered 07/17/19 16:04:43 Desc Page 2 of 5				
1	GHIDOTTI BERGER, LLP, requests that for all notice purposes and for inclusion in				
2	the Master Mailing List in this case, the following address be used:				
3	GHIDOTTI BERGER, LLP				
4	1920 Old Tustin Ave. Santa Ana, CA 92705				
5	Telephone (949) 427-2010 – Fax: (949) 427-2732 bknotifications@ghidottiberger.com				
6	Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,				
7	proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a				
8	waiver of the within party's:				
9	a. Right to have any and all final orders in any and all non-core matters entered				
10	only after de novo review by a United States District Court Judge;				
11	b. Right to trial by jury in any proceeding as to any and all matters so triable				
12	herein, whether or not the same be designated legal or private rights, or in any case,				
13 14	controversy or proceeding related hereto, notwithstanding the designation or not of such				
15	matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial				
16	right is pursuant to statute or the United States Constitution;				
17	c. Right to have the reference of this matter withdrawn by the United States				
18	District Court in any matter or proceeding subject to mandatory or discretionary withdrawal;				
19	and				
20	d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to				
21	which this party is entitled under any agreements at law or in equity or under the United States				
22	Constitution.				
23					
24					
25					
26					
27					
28					

Case	16-33299-ABA Doc 66	Filed 07/17/19 Entered 07/17/19 16:04:43 Desc Page 3 of 5	
1	All of the above rights are expressly reserved and preserved by this party without		
2	exception and with no purpose of confessing or conceding jurisdiction in any way by this filing		
3	or by any other participation in these matters.		
4			
5	Data da Indon 17, 2010	GHIDOTTI BERGER, LLP	
6	Dated: July 17, 2019	By:/s/ Michelle R. Ghidotti-Gonsalves Michelle R. Ghidotti-Gonsalves, Esq.	
7		Authorized Agent for US Bank Trust National Association as Trustee of the Chalet Series IV	
8		Trust C/O BSI Financial Services	
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19 20			
21			
22			
23			
24			
25			
26			
27			
28			
	REQUEST FOR SPECIAL	L NOTICE AND SERVICE OF PAPERS AND RESERVATIONS OF RIGHTS	

Case	16-33299-ABA Doc 66 Filed 07/17/19 Page 4 of 5	Entered 07/17/19 16:04:43 Desc			
1	UNITED STATES B	UNITED STATES BANKRUPTCY COURT			
2	DISTRICT OF NEV	DISTRICT OF NEW JERSEY (CAMDEN)			
3)			
4	In Re; RAYMOND W LEONG) Case No.: 16-33299-ABA			
5	Debtor(s).) CHAPTER 13			
6) CERTIFICATE OF SERVICE			
7)			
8)			
9)			
10)			
11					
12	CERTIFICATE OF SERVICE				
13					
14		ge, State of California. I am over the age of			
15	eighteen and not a party to the within action. My business address is: 1920 Old Tustin Avenue,				
16	Santa Ana, CA 92705.				
17	I am readily familiar with the business's practice for collection and processing of				
18	correspondence for mailing with the United St	tates Postal Service; such correspondence would			
19	be deposited with the United States Postal Service the same day of deposit in the ordinary				
20	course of business.				
21	course of outsiness.				
22					
23					
24					
25					
26					
27					
28					
	1				
	CERTIFICA	TE OF SERVICE			

Case	16-33299-ABA Doc 66 Filed 07/17/19 Ei Page 5 of 5	ntered 07/17/19 16:04:43 Desc	
1	On July 17, 2019 I served the following documents described as:		
2	• REQUEST FOR SPECIAL NOTICE		
3	on the interested parties in this action by placing a true and correct copy thereof in a sealed		
4	envelope addressed as follows:		
5			
6		Chapter 13 Trustee	
7		Isabel C. Balboa Chapter 13 Standing Trustee	
8	Audubon, NJ 08106	Cherry Tree Corporate Center 535 Route 38 - Suite 580	
9	Debtor's Counsel	Cherry Hill, NJ 08002	
10	III - I	U.S. Trustee	
11	 	U.S. Trustee US Dept of Justice	
12		Office of the US Trustee One Newark Center Ste 2100	
13	III	Newark, NJ 07102	
14			
15			
16			
17			
18			
19	vv (Ry First Class Mail) At my business add	ress, I placed such envelope for deposit with	
20	the United States Postal Service by placing them		
21	following ordinary business practices.		
22	Via Electronic Mail pursuant to the require Eastern District of California	rements of the Local Bankruptcy Rules of the	
23	<u>xx</u> (Federal) I declare under penalty of perjury	y under the laws of the United States of	
24	America that the foregoing is true and correct.	y ander the laws of the Office States of	
25	Executed on July 17, 2019 at Santa Ana,	California	
26	/s/ David Tragarz		
27	David Tragarz		
28			
	2		

CERTIFICATE OF SERVICE